

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF SARA B.  
TOMEZSKO IN SUPPORT OF  
DEFENDANT GOOGLE LLC'S  
MOTION FOR SUMMARY  
JUDGMENT**

I, SARA B. TOMEZSKO, declare:

1. I am admitted to the Bar of this Court, and an attorney with the firm of Paul Hastings LLP, counsel for Defendant Google LLC in this action. I make this declaration in support of Google's Motion for Summary Judgment. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. On October 14, 2020 and February 23, 2021, counsel for Google took Plaintiff Ulku Rowe's sworn deposition. Attached to this declaration as **Exhibit 1** are true and correct copies of relevant excerpts of the deposition transcripts of Plaintiff.

3. On October 29, 2020 counsel for Plaintiff took the sworn deposition of Will Grannis. Attached to this declaration as **Exhibit 2** are true and correct copies of relevant excerpts of the deposition transcript of Mr. Grannis.

4. On October 15, 2020 counsel for Plaintiff took the sworn deposition of Tariq Shaukat. Attached to this declaration as **Exhibit 3** are true and correct copies of relevant excerpts of the deposition transcript of Mr. Shaukat.

5. On October 2, 2020 counsel for Plaintiff took the sworn deposition of Adam Lief. Attached to this declaration as **Exhibit 4** are true and correct copies of relevant excerpts of the deposition transcript of Mr. Lief.

6. On October 27, 2020 counsel for Plaintiff took the sworn deposition of Kevin Lucas. Attached to this declaration as **Exhibit 5** are true and correct copies of relevant excerpts of the deposition transcript of Mr. Lucas.

7. On December 9, 2020 counsel for Plaintiff took the sworn deposition of Jennifer Burdis. Attached to this declaration as **Exhibit 6** are true and correct copies of relevant excerpts of the deposition transcript of Ms. Burdis.

8. On November 17, 2020 counsel for Plaintiff took the sworn deposition of Stuart Vardaman. Attached to this declaration as **Exhibit 7** are true and correct copies of relevant excerpts of the deposition transcript of Mr. Vardaman.

9. On December 3, 2020 counsel for Plaintiff took the sworn deposition of Evren Eryurek. Attached to this declaration as **Exhibit 8** are true and correct copies of relevant excerpts of the deposition transcript of Mr. Eryurek.

10. On December 2, 2020 counsel for Plaintiff took the sworn deposition of Benjamin Wilson. Attached to this declaration as **Exhibit 9** are true and correct copies of relevant excerpts of the deposition transcript of Mr. Wilson.

11. Attached to this declaration as **Exhibit 10** is a true and correct copy of Plaintiff's deposition exhibit 5 bearing bates numbers P-000436–37 and used at the depositions of Ulku Rowe.

12. Attached to this declaration as **Exhibit 11** are a true and correct copies of relevant excerpts of Evren Eryurek's Hiring Packet. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE-00061917–66.

13. Attached to this declaration as **Exhibit 12** are a true and correct copies of relevant excerpts of Paul Strong's Hiring Packet. Upon information and belief, this document was kept in

the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE-00061880-904.

14. Attached to this declaration as **Exhibit 13** are a true and correct copies of relevant excerpts of Jonathan Donaldson's Hiring Packet. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE-00063078-111.

15. Attached to this declaration as **Exhibit 14** are a true and correct copies of relevant excerpts of Ben Wilson's Hiring Packet. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE-00062214-43.

16. Attached to this declaration as **Exhibit 15** are a true and correct copies of relevant excerpts of Ulku Rowe's Hiring Packet. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE-00019097.R-146.R.

17. Attached to this declaration as **Exhibit 16** is a true and correct copy of the relevant excerpt of Plaintiff's deposition exhibit 7 bearing bates number P-000550 and used at the depositions of Ulku Rowe.

18. Attached to this declaration as **Exhibit 17** are a true and correct copies of relevant excerpts of Nick Harteau's Hiring Packet. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE-00056318.R-46.R.

19. Attached to this declaration as **Exhibit 18** is a true and correct copy of deposition exhibit 3 bearing bates numbers P-001586-87 and used at the depositions of Ulku Rowe.

20. Attached to this declaration as **Exhibit 19** is a true and correct copy of an email

chain dated January 10, 2018 between Ulku Rowe, Melissa Lawrence, and Will Grannis. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017406.

21. Attached to this declaration as **Exhibit 20** is a true and correct copy of the relevant excerpt of an email chain dated November 16, 2018 through November 18, 2018 between Melissa Lawrence, Will Grannis, and Brian Stevens. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017375.R.

22. Attached to this declaration as **Exhibit 21** is a true and correct copy of the relevant excerpt of Ulku Rowe's 2017 Q3 Performance Review. This document was produced in this litigation by Plaintiff bearing bates numbers P000198–201.

23. Attached to this declaration as **Exhibit 22** is a true and correct copy of the relevant excerpt of Ulku Rowe's 2018 Q1 Performance Review. This document was produced in this litigation by Plaintiff bearing bates numbers P000004–10.

24. Attached to this declaration as **Exhibit 23** is a true and correct copy of Ulku Rowe's 2019 Q3 Performance Review. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017919.

25. Attached to this declaration as **Exhibit 24** is a true and correct copy of the relevant excerpt of Ulku Rowe's 2020 Q3 Performance Review. This document was produced in this litigation by Plaintiff bearing bates numbers P001690–97.

26. Attached to this declaration as **Exhibit 25** is a true and correct copy of an email chain dated June 27, 2018 between Ulku Rowe, Tariq Shaukat, and Paul Ferrand. Upon information and belief, this document was kept in the normal course of business in Google's files

and produced in this litigation bearing bates numbers GOOG-ROWE-P-00000773–74.

27. Attached to this declaration as **Exhibit 26** is a true and correct copy of an email chain dated June 13, 2018 through June 14, 2018 between Ulku Rowe, Tariq Shaukat, Will Grannis, Melissa Lawrence, and Brian Stevens. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE-P-00000726–27.

28. Attached to this declaration as **Exhibit 27** is a true and correct copy of an email chain dated June 13, 2018 between Ulku Rowe, Melissa Lawrence, Brian Stevens, and Will Grannis. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE- 00017425–26.

29. Attached to this declaration as **Exhibit 28** is a true and correct copy of the relevant excerpt of an email chain dated July 3, 2018 through August 6, 2018 between Evren Eryurek, Ulku Rowe, Will Grannis, and Eryka Wetherall. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE-00059675–77.

30. Attached to this declaration as **Exhibit 29** is a true and correct copy of an email chain dated August 20, 2018 between Ulku Rowe and Tariq Saukat. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017554.

31. Attached to this declaration as **Exhibit 30** is a true and correct copy of an email chain dated September 21, 2018 between Ulku Rowe, Kimberly Scott, and Tariq Saukat. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017568.

32. Attached to this declaration as **Exhibit 31** is a true and correct copy of the relevant excerpt of an email chain dated September 21, 2018 from Tariq Saukat. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017569.

33. Attached to this declaration as **Exhibit 32** is a true and correct copy of an email chain dated October 19, 2018 between Ulku Rowe and Tariq Shaukat. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017582.

34. Attached to this declaration as **Exhibit 33** is a true and correct copy of the Head of Financial Services (FSVL) Job Description. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates numbers GOOG-ROWE-00017499–501.

35. Attached to this declaration as **Exhibit 34** is a true and correct copy of an email chain dated August 1, 2018 through August 8, 2018 between Megan Murray, Sebastien Marotte, and Stuart Vardaman. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017533.

36. Attached to this declaration as **Exhibit 35** is a true and correct copy of an email dated November 12, 2018 from Stuart Vardaman to Dave Beuerlein. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017598.

37. Attached to this declaration as **Exhibit 36** is a true and correct copy of deposition exhibit 74 bearing bates numbers GOOG-ROWE-00017589–90 and used at the deposition of Kevin Lucas.

38. Attached to this declaration as **Exhibit 37** is a true and correct copy of an email dated November 13, 2018 from April Beaupain to Ulku Rowe. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number P000102.

39. Attached to this declaration as **Exhibit 38** is a true and correct copy of an email dated November 17, 2018 from Tariq Shaukat to Tariq Shaukat. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-P-00002062.

40. Attached to this declaration as **Exhibit 39** is a true and correct copy of an email chain dated December 4, 2018 between Ulku Rowe, Tariq Shaukat, Megan Murray, Morgan Kuhn, and Stuart Vardaman. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017642.

41. Attached to this declaration as **Exhibit 40** is a true and correct copy of an email chain dated January 1, 2019 through January 2, 2019 between Diana Layfield, and Tariq Shaukat. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-00017648.

42. Attached to this declaration as **Exhibit 41** is a true and correct copy of an email dated December 5, 2018 from Tariq Shaukat to Kevin Lucas and Fiona O'Donnell. Upon information and belief, this document was kept in the normal course of business in Google's files and produced in this litigation bearing bates number GOOG-ROWE-P-00017643.


43. Attached to this declaration as **Exhibit 42** is a true and correct copy of the relevant excerpt of deposition exhibit 22 bearing bates number GOOG-ROWE-P-00000827 and used at the deposition of Ulku Rowe.

44. Attached to this declaration as **Exhibit 43** is a true and correct copy of deposition exhibit 116 bearing bates numbers GOOG-ROWE-00060571–72 and used at the deposition of Stuart Vardaman.

45. Attached to this declaration as **Exhibit 44** is a true and correct copy of deposition exhibit 115 bearing bates numbers GOOG-ROWE-00060560–62 and used at the deposition of Stuart Vardaman.

**PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE FALSE, I AM SUBJECT TO PUNISHMENT.**

Executed this 1st day of November, 2021, at Jersey City, New Jersey.

  
Sara B. Tomczko